

ABOVE THIS LINE FOR DIVISION USE ONLY

**NEW MEXICO OIL CONSERVATION DIVISION**  
 - Engineering Bureau -  
 1220 South St. Francis Drive, Santa Fe, NM 87505



*Williams Production*  
*Rosa Unit #378A*  
*APL 30-039-30152*

**ADMINISTRATIVE APPLICATION CHECKLIST**

*5965*

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

**Application Acronyms:**

- [NSL-Non-Standard Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedication]
- [DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling]
- [PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement]
- [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion]
- [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase]
- [EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]

[1] **TYPE OF APPLICATION** - Check Those Which Apply for [A]

- [A] Location - Spacing Unit - Simultaneous Dedication  
 NSL  NSP  SD

Check One Only for [B] or [C]

- [B] Commingling - Storage - Measurement  
 DHC  CTB  PLC  PC  OLS  OLM

- [C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery  
 WFX  PMX  SWD  IPI  EOR  PPR

[D] Other: Specify \_\_\_\_\_

[2] **NOTIFICATION REQUIRED TO:** - Check Those Which Apply, or Does Not Apply

- [A]  Working, Royalty or Overriding Royalty Interest Owners
- [B]  Offset Operators, Leaseholders or Surface Owner
- [C]  Application is One Which Requires Published Legal Notice
- [D]  Notification and/or Concurrent Approval by BLM or SLO  
U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office
- [E]  For all of the above, Proof of Notification or Publication is Attached, and/or,
- [F]  Waivers are Attached

[3] **SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE.**

[4] **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

*Heather Riley*  
 Print or Type Name

*Heather Riley*  
 Signature

*Regulatory Specialist* *10/22/08*  
 Title Date

*heather.riley@williams.com*  
 e-mail Address

RECEIVED  
 2008 OCT 23 PM 3 30



P. O. Box 640  
Aztec, NM 87410  
(505) 634-4222  
(505) 634-4205 (fax)  
[Heather.riley@williams.com](mailto:Heather.riley@williams.com)

October 22, 2008

Mark E. Fesmire  
NEW MEXICO OIL CONSERVATION DIVISION  
1220 South Saint Francis Drive  
Santa Fe, NM 87505

*Re: Request for Administrative Approval for Non-standard Fruitland Coal Location  
Rosa Unit #378A  
API # (30-039-30152)  
SE4 (Unit O), Sec. 27, T31N, R5W  
SHL: 510' FWL and 2225' FEL  
BHL: 1021' FSL & 2225' FEL*

Dear Mr. Fesmire:

Williams Production Co., LLC, ("Williams") is requesting administrative approval to construct the Rosa Unit #378A as a single Fruitland Coal in a non-standard location. Pursuant to Order No. R-8768-F, spacing requirements state that the wells shall be located not closer than 660 feet to any outer boundary of the spacing unit and no closer than 10 feet to any interior quarter-quarter section line or subdivision inner boundary. Given these requirements, this location is non-standard to the west by 246.32'.

The surface location for this well was chosen based on archeological and topographical constraints. There are many archeological sites in the SE4 of Section 27 and the topography consists of narrow benches and active drainages for Cabresto Canyon. This well was directionally drilled to the current bottom hole location of 1021' FSL and 2225' FEL. The bottom hole location was chosen based on best drainage and planning for future development.

**We inadvertently failed to get approval of this non-standard location prior to drilling the well. We would greatly appreciate your expediting this administrative approval.**

As the Unit Operator of the Rosa Unit, Williams is the only offset operator, thereby this proposed non-standard location would not affect any other operators.

Mark E. Fesmire  
October 22, 2008  
Page 2 of 2

Mineral ownership is common and there are no unleased mineral owners. The offset unit's working interest owners are uncommon; therefore, we have enclosed a list of the affected persons for your review. Williams has given notice to the listed parties in accordance with Division Rules.

Enclosed for your reference is a copy of the Participating Area map for the Fruitland Formation. As you can see, the west half of Section 27 is in a PA but the east half is not.

The spacing unit for the Fruitland is the east half and the other Fruitland well in the spacing unit is the Rosa Unit #378.

Should you have any questions or concerns, please don't hesitate to contact me at the phone numbers listed above. You can also contact Vern Hansen at our Tulsa office at (918) 573-6169.

Sincerely,



Heather Riley  
Regulatory Specialist

Enc.: 1<sup>st</sup> page of the APD  
Plat  
Topographic map  
PA Map (FT)  
Affected Interest Owner letter and list of addresses

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

APPLICATION FOR PERMIT TO DRILL OR REENTER

RECEIVED

FORM APPROVED  
OMB No. 1004-0136  
Expires January 31, 2004

JAN 03 2007

Bureau of Land Management  
Farmington Field Office

1a. Type of Work: <input checked="" type="checkbox"/> DRILL <input type="checkbox"/> REENTER		5. Lease Serial No. SF-078770	
1b. Type of Well: <input type="checkbox"/> Oil Well <input checked="" type="checkbox"/> Gas Well <input type="checkbox"/> Other <input checked="" type="checkbox"/> Single Zone <input type="checkbox"/> Multiple Zone		6. If Indian, Allottee or Tribe Name	
2. Name of Operator Williams Production Company, LLC		7. If Unit or CA Agreement, Name and No. Rosa Unit	
3a. Address P.O. Box 640 Aztec, NM 87410		8. Lease Name and Well No. 378A	
3b. Phone No. (include area code) (505) 634-4208		9. API Well No. 30-039-30152	
4. Location of Well (Report location clearly and in accordance with any State requirements *) At surface 510' FSL & 2225' FEL, Section 27, T.31N, R.5W. At proposed prod. zone 990' FSL & 2225' FEL, Section 27, T.31N, R.5W		10. Field and Pool, or Exploratory Basin Fruitland Coal	
14. Distance in miles and direction from nearest town or post office* approximately 32 miles northeast of Blanco, New Mexico		11. Sec, T, R, M, or Blk. and Survey or Area BHL Section 27, T31N, R5W Surface Section 27, T31N, R5W	
15. Distance from proposed* location to nearest property or lease line, ft (Also to nearest drig. unit line, if any) 510'		12. County or Parish Rio Arriba	
16. No. of Acres in lease 2,560.00		13. State NM	
17. Spacing Unit dedicated to this well 320.00 C Marquez 340.92 (E/2) Section 27			
18. Distance from proposed location* to nearest well, drilling, completed, applied for, on this lease, ft. 1500'		20. BLM/BIA Bond No. on file WT0847 W TO 899	
19. Proposed Depth 3,752'		21. Elevations (Show whether DF, KDB, RT, GL, etc.) 6758 GR	
22. Approximate date work will start* June 1, 2007		23. Estimated duration 1 month	
24. Attachments			

The following, completed in accordance with the requirements of Onshore Oil and Gas Order No 1, shall be attached to this form:

- Well plat certified by a registered surveyor.
- A Drilling Plan.
- A Surface Use Plan (if the location is on National Forest System Lands, the SUPO shall be filed with the appropriate Forest Service Office).
- Bond to cover the operations unless covered by an existing bond on file (see Item 20 above)
- Operator certification
- Such other site specific information and/or plans as may be required by the authorized officer

RCVD MAR 18 '08

OIL CONS. DIV.

DIST 2

25. Signature <i>Larry Higgins</i>	Name (Printed/Typed) Larry Higgins	Date 1-2-07
Title Drilling COM		
Approved by (Signature) <i>D. Mantelwes</i>	Name (Printed/Typed) AFM	Date 3/14/08
Title AFM	Office FFO	

Application approval does not warrant or certify that the applicant holds legal or equitable title to those rights in the subject lease which would entitle the applicant to conduct operations thereon.

Conditions of approval, if any, are attached.

Title 18 U.S.C. Section 1001 and Title 43 U.S.C. Section 1212, make it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction.

\*(Instructions on reverse)

Williams Exploration and Production Company, LLC, proposes to drill a well to develop the Basin Fruitland Coal formation at the above described location in accordance with the attached drilling and surface use plans

The surface is under jurisdiction of the U S Forest Service, Jicarilla Ranger District, Carson National Forest.

This location has been archaeologically surveyed La Plata Archaeological Consultants. Copies of their report have been submitted directly to the USFS, Jicarilla Ranger District

This APD is also serving as an application to obtain an access road and gas pipeline. Required for this location is a 1,400.00-foot access road, and a gas pipeline of 1,600.50 feet, to be placed adjacent to the access road

Hold C104

for Directional Survey  
and "As Drilled" plat

NOTIFY AZTEC 24 HRS.

PRIOR TO CASING & CEMENT

BLM'S APPROVAL OR ACCEPTANCE OF THIS ACTION DOES NOT RELIEVE THE LESSEE AND OPERATOR FROM OBTAINING ANY OTHER AUTHORIZATION REQUIRED FOR OPERATIONS ON FEDERAL AND INDIAN LANDS

DRILLING OPERATIONS AUTHORIZED ARE SUBJECT TO COMPLIANCE WITH ATTACHED "GENERAL REQUIREMENTS".

NMOCD  
MAR 24 2008 AV

This action is subject to technical and procedural review pursuant to 43 CFR 3165.3 and appeal pursuant to 43 CFR 3165.4

District I  
1625 N. French Dr., Hobbs, NM 88240

District II  
1301 W. Grand Avenue, Artesia, NM 88210

District III  
1000 Rio Brazos Rd., Aztec, NM 87410

District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-102  
Revised October 12, 2005  
Instructions on back  
Submit to Appropriate District Office  
State Lease - 4 Copies  
Fee Lease - 3 Copies

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

<sup>1</sup> API Number		<sup>2</sup> Pool Code 71629		<sup>3</sup> Pool Name BASIN FRUITLAND COAL	
<sup>4</sup> Property Code 17033		<sup>5</sup> Property Name ROSA UNIT			<sup>6</sup> Well Number 378A
<sup>7</sup> OGRID No. 120782		<sup>8</sup> Operator Name WILLIAMS PRODUCTION COMPANY			<sup>9</sup> Elevation 6758'

<sup>10</sup> Surface Location

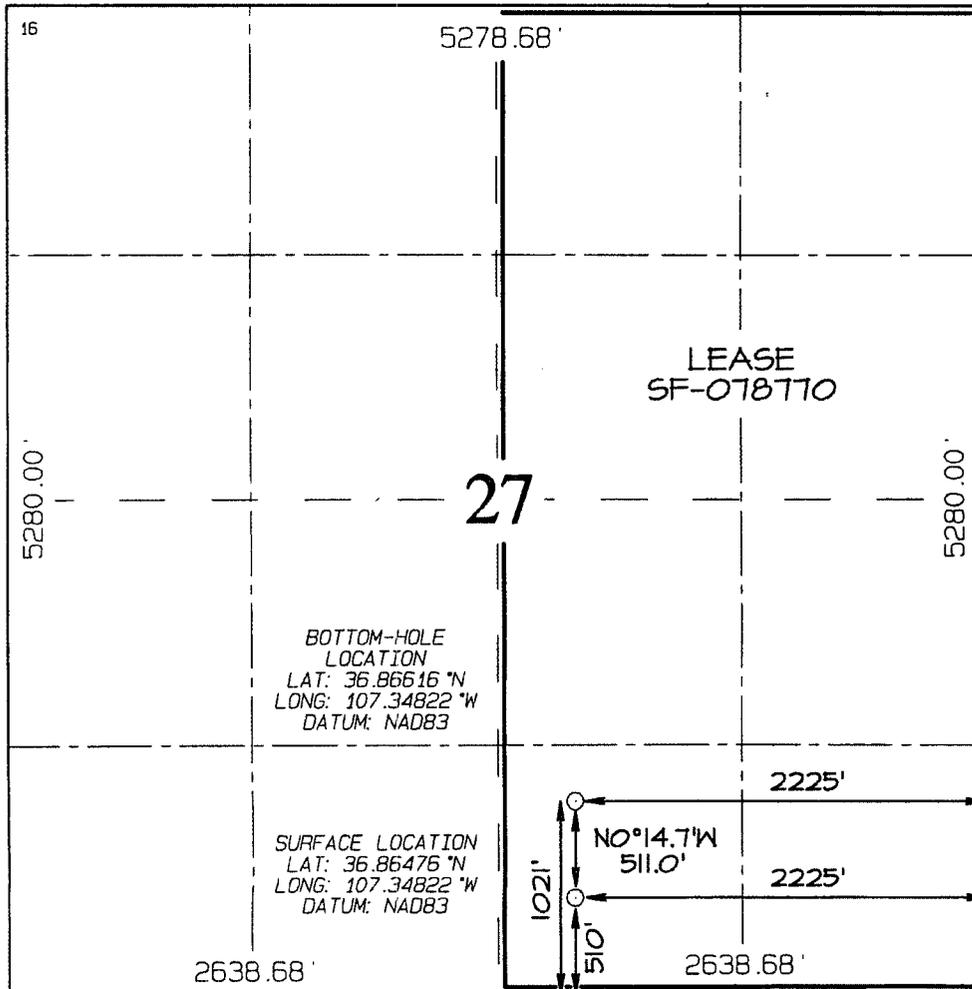
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
0	27	31N	5W		510	SOUTH	2225	EAST	RIO ARRIBA

<sup>11</sup> Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
0	27	31N	5W		1021	SOUTH	2225	EAST	RIO ARRIBA

<sup>12</sup> Dedicated Acres 320.0 Acres - (E/2)	<sup>13</sup> Joint or Infill	<sup>14</sup> Consolidation Code	<sup>15</sup> Order No.
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NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION



<sup>17</sup> OPERATOR CERTIFICATION

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom-hole location or has a right to drill this well at this location pursuant to a contract with an owner of such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.

Signature \_\_\_\_\_ Date \_\_\_\_\_

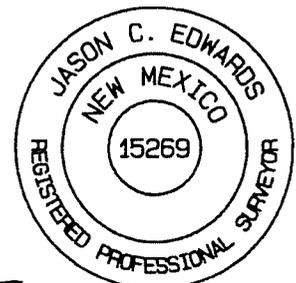
Printed Name \_\_\_\_\_

<sup>18</sup> SURVEYOR CERTIFICATION

I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.

Survey Date: OCTOBER 13, 2005

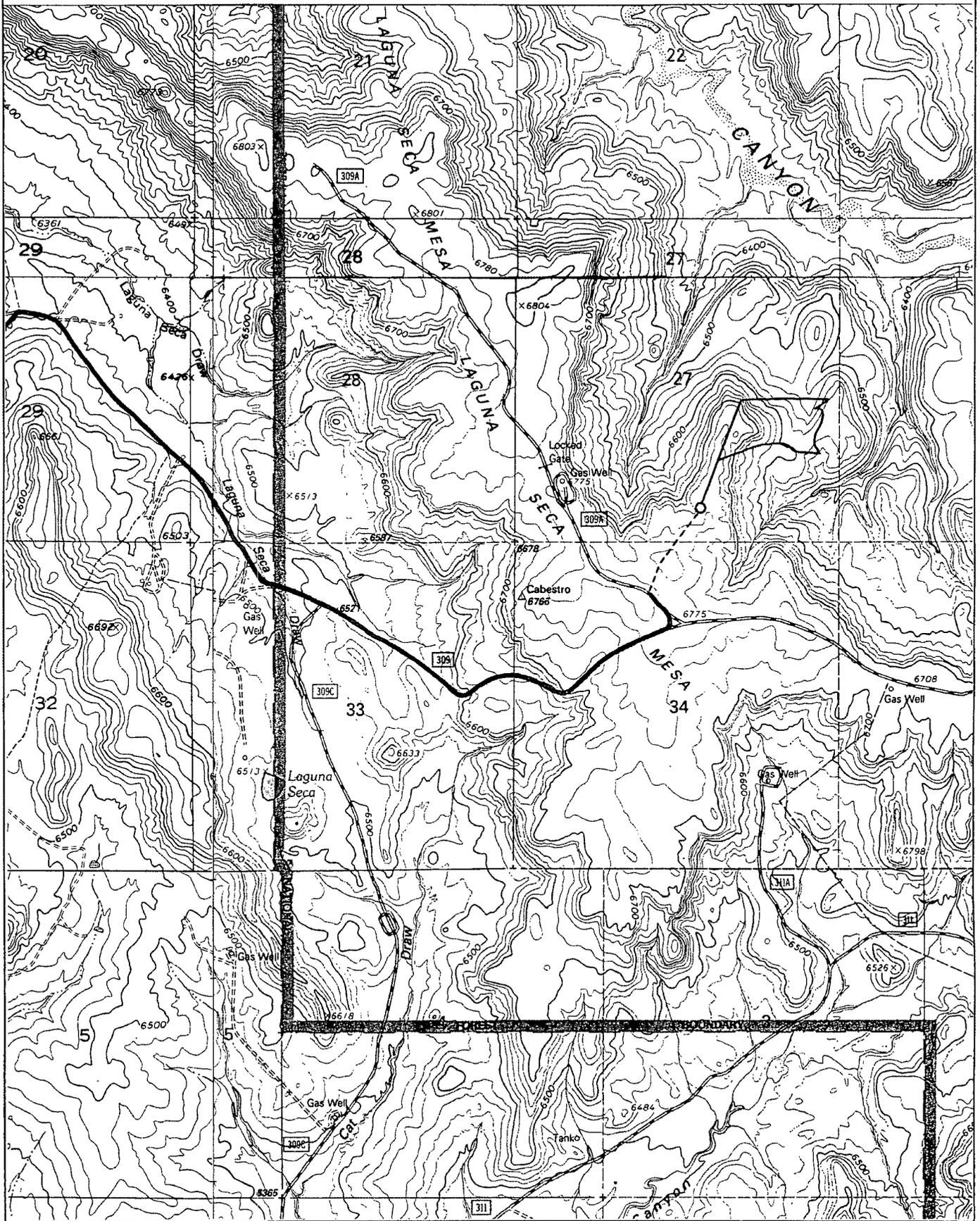
Signature and Seal of Professional Surveyor

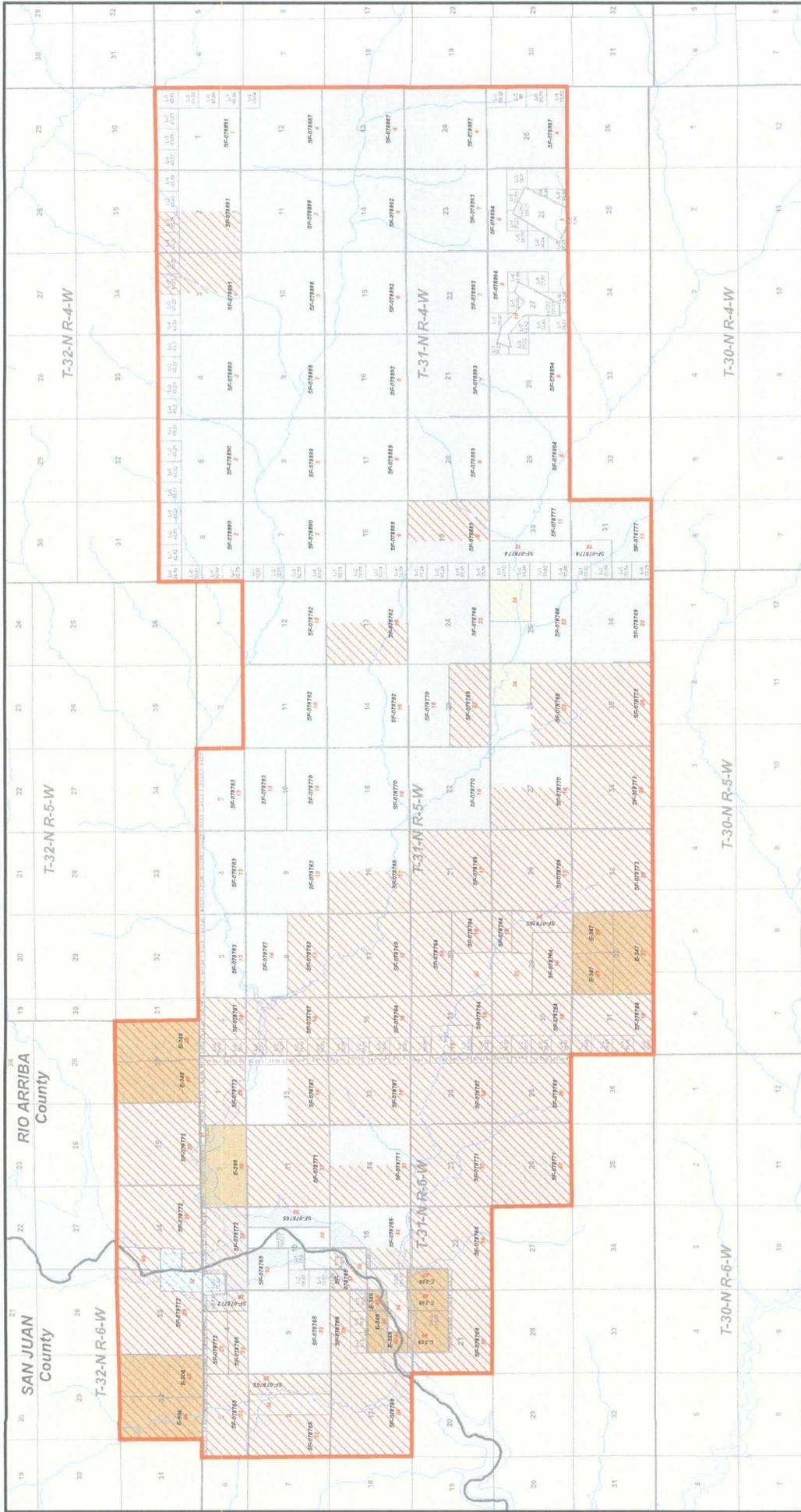


JASON C. EDWARDS

Certificate Number 15269

WILLIAMS PRODUCTION COMPANY ROSA UNIT #378A  
510' FSL & 2225' FEL, SECTION 27, T31N, R5W, N.M.P.M.  
RIO ARRIBA COUNTY, NEW MEXICO





**Rosa Unit Tract No: XX**

- Full-time Participating Area 5th Expansion
- Mineral Ownership
- Federal
- Private
- Partially Committed
- State
- Not Committed

6,000 3,000 0 6,000 12,000 Feet

Exploration & Production

**Rosa Unit**  
**Fruitland Formation**  
 San Juan and Rio Arriba Counties, New Mexico

Projection: NAD 1983 State Plane NM West  
 Scale: 1:72,000  
 Date: 3/7/2007  
 Author: SA



WILLIAMS PRODUCTION COMPANY, LLC  
One Williams Center  
P.O. Box 3102  
Tulsa, OK 74101-3102  
918/573-6169

October 22, 2008

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

**AFFECTED INTEREST OWNERS**

Re: Application of Williams Production Company, LLC for administrative approval of an unorthodox well location for its Rosa Unit #378A Fruitland Coal formation well drilled at a location 1021 feet from the South line and 2225 feet from the East line of Section 27, Township 31 South, Range 5 West, N.M.P.M., Rio Arriba County, New Mexico.

Ladies and Gentlemen:

Enclosed is a copy of the above-referenced application which was filed with the New Mexico Oil Conservation Division on this date by Williams Production Company, LLC for administrative approval of an unorthodox well location for its Rosa Unit #378A, drilled to the Fruitland Coal formation at a location 1021 feet from the South line and 2225 feet from the East line of Section 27, Township 31 South, Range 5 West, N.M.P.M., Rio Arriba County, New Mexico. The E/2 of Sec.27, T31N, R5W, a standard 320.00 acre spacing unit is dedicated to the well.

As an owner of an interest that may be affected by the proposed well, you may object to this application. Objections must be filed in writing within twenty days from this date at the Division's Santa Fe office that is located at 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505. If no objection is received within this twenty-day period, this application for an unorthodox well location may be approved.

Sincerely,

A handwritten signature in black ink that reads "M. Vern Hansen".

M. Vern Hansen, CPL  
Senior Staff Landman

Enclosures

**Rosa Unit #378A Fruitland Coal Formation Well  
Affected Interest Owners**

BP AMERICA PRODUCTION CO.  
ATTN: JOHN LARSON  
P.O. BOX 3092  
HOUSTON, TX 77253

MR. FRED E. TURNER, L.L.C.  
4925 GREENVILLE AVENUE, SUITE 852  
DALLAS, TX 75206-4079

MS. ELIZABETH T. CALLOWAY  
P.O. BOX 191767  
DALLAS, TX 75219-1767

MR. J. GLENN TURNER, JR., L.L.C.  
3838 OAK LAWN, SUITE 1450  
DALLAS, TX 75219

MR. JOHN TURNER  
PMB 285  
317 SIDNEY BAKER SOUTH #400  
KERRVILLE, TX 78028

SACRAMENTO MUNICIPAL UTILITIES DISTRICT  
ATTN: BARRY BRUNELLE  
P.O. BOX 15830  
SACRAMENTO, CA 95852-1830

MARY FRANCES TURNER, JR TRUST  
ATTN: BARRY L. DOMINICK  
TX1-2931  
P.O. BOX 660197  
DALLAS, TX 75266-0197

FOREST OIL CORPORATION  
ATTN: KEN MCPHEE  
707 17<sup>TH</sup> STREET  
DENVER, CO 80202

CONOCOPHILLIPS COMPANY  
ATTN: CHIEF LANDMAN, SAN JUAN/ROCKIES  
P.O. BOX 4289  
FARMINGTON, NM 87499-4289